

June 15, 1999

JUN 17 1999

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: Creation of Low Power FM Service

MM Docket 99-25

Dear Sir/Madam:

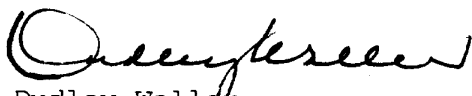
My company, Waller Broadcasting, Inc., is the licensee of KEBE (AM), a local Class D station, it purchased in 1958. In 1967 we went on the air with the first 100,000 watt station and first FM Stereo station in East Texas. I have invested 40 years of my life trying to make a success of these stations, paying for them, and providing the best possible service to the local public.

The city of license for both stations is Jacksonville, a small East Texas town of just over 10,000. KEBE, with a strong commitment to local affairs, has a limited coverage with a radius of only 12 to 15 miles, and with the emergence of FM, revenue losses have increased steadily for 10 years.

KOOI, the only full-power FM in the market with local personalities and news people, can not survive in the highly competitive 3-county Metro unless it continues to serve all the listeners it now reaches with a high quality signal. If LPFM is created, the interference caused in a substantial portion of that Metro will result in the loss of many of our present listeners. The lower ratings will cause revenue losses we simply can not afford.

As the 80-90 experience has taught us, the spectrum damage caused by LPFM will lead to another nationwide decline in meaningful service to the local public. If you approve LPFM, I'm afraid it will sink us and many others like us throughout the industry. Even worse, only the group owners and "virtual radio" programmed from distant cities will remain. Thus your reason for creating LPFM, will have just the opposite effect of what you want to accomplish.

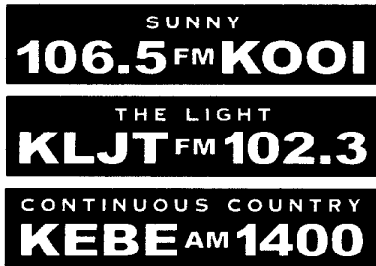
Sincerely,



Dudley Waller  
Waller Broadcasting, Inc., Licensee  
KEBE-KOOI Radio  
P.O. Box 1648  
Jacksonville, Texas 75766

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List ABCDE

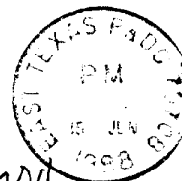
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Radio Center • P. O. Box 1648, Jacksonville, TX 75766

621 Chase Drive • Tyler, TX 75701

LB&T Office Plaza, Ste. 204 • Longview, TX 75604



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